

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CIVIL ACTION NO. 5:23-cv-0168**

GLOBAL DIMENSIONS, LLC
923 Maple Grove Drive, Suite 201,
Fredericksburg, VA 22407,

Plaintiff,

v.

RANDALL TACKETT
136 Springside Drive
Spring Lake, North Carolina 28390,

and

SPECIAL OPERATIONS CONSULTING
AND DEVELOPMENT, LLC
136 Springside Drive
Springside Lake, North Carolina 28390

Defendants.

DEFENDANTS' MOTION TO SEAL

NOW COME Defendants, Randall Tackett and Special Operations Consulting and Development, LLC ("Defendants"), by and through their undersigned counsel, pursuant to Rule 7 of the Federal Rules of Civil Procedure and Local Civil Rule 79.2, and hereby move the Court for leave to seal the following:

1. Defendants' Response in Opposition to Plaintiff's Motion to Show Cause and the exhibits attached.

Counsel for Defendants respectfully requests that the Court consider these documents under seal when ruling on Defendants' Motion to Seal. The parties entered into a

Confidentiality Stipulation. [Dt.130-3]. The Confidentiality Stipulation provided that the parties may designate documents produced in discovery as “Confidential” or “Confidential – Attorneys’ Eyes Only” and that documents designated by a party as such, shall be filed or submitted under seal. Defendants’ Response in Opposition to Plaintiff’s Motion to Show Cause discusses and attaches as exhibits documents that Plaintiff designated with the stamp of “Confidential” or “Confidential – Attorneys’ Eyes Only”.

Thus, in compliance with the Confidentiality Stipulation, Defendants seek to file Defendants’ Response in Opposition to Plaintiff’s Motion to Show Cause and the exhibits attached under seal. Electronically filing these documents in the usual manner, such that it would be accessible by the public, may not comply with the Confidentiality Stipulation.

WHEREFORE, Defendants respectfully request that the Court allow Defendants’ Motion to Seal.

Respectfully submitted this, the 10th day of September 2024.

VAN CAMP, MEACHAM & NEWMAN, PLLC
Attorney for Defendants

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CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing **DEFENDANTS' MOTION TO SEAL** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the registered participants as identified on the Notice of Electronic Filing (NEF).

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This, the 10th day of September 2024.

VAN CAMP, MEACHAM & NEWMAN, PLLC
Attorney for Defendants

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